REMARKS

I. Summary of the Office Action and Status of the Claims

In the office action mailed May 23, 2011, the Examiner rejected claims 3-6, 8-10, 13-17, and 19-22 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 7,328,260 (Muthiyan) in view of U.S. Patent No. 6,697,845 (Andrews).

Claims 3-6, 8-10, 13-17, and 19-22 are presently pending. Of these, claims 3, 8, and 14 are independent and the remaining claims are dependent. The claims are not amended in this response.

II. Summary of the July 20, 2011 Examiner Interview

On July 20, 2011, the Examiner and Tom Loos for the Applicant discussed the application via telephone.

Regarding the § 103 rejection of claim 3, Applicant argued that, even if Muthiyan discloses sending traps to management servers, Muthiyan does not disclose a trap message that triggers a request for a walk operation as recited as "in response to receiving the trap message, transmitting to the agent a request to perform a walk operation" in claim 3. The Examiner responded by saying that, while a trap that causes a walk operation was not explicitly disclosed, Muthiyan does disclose traps, and does not fail to disclose that a device could trigger a walk operation.

Applicant also argued that at least Figure 21 and the supporting disclosure on col. 58, line 10 – col. 59, line 45 of Muthiyan does not disclose or suggest "transmitting … updated MIB information to the agent." The Examiner agreed to take this argument into consideration.

Agreement on the claims was not reached.

McDONNELL BOEHNEN
HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE, 32ND FLOOR
CHICAGO, IL 60606
(312)913-0001

No other art, claims, or substantive issues were discussed.

Applicant thanks the Examiner for sharing his time and expertise during the interview.

III. Rejections under 35 U.S.C. § 103(a)

The Examiner rejected claims 3-6, 8-10, 13-17, and 19-22 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Muthiyan in view of Andrews.

Applicant submits that the cited art, alone or in combination, does not disclose or suggest all features of Applicant's claims and therefore does not support rejection of claims 3-6, 8-10, 13-17, and 19-22 under 35 U.S.C. § 103(a). Further, Applicant submits that the Examiner has failed to establish a *prima facie* case of obviousness of these claims under § 103(a). Applicant therefore respectfully requests the Examiner reconsider and withdraw the rejections of claims 3-6, 8-10, 13-17, and 19-22 under 35 U.S.C. § 103(a).

i. Discussion of Muthiyan in Response to the Rejection of Claim 3

Claim 3 recites, in part, "in response to receiving the trap message, transmitting to the agent a request to perform a walk operation, wherein the NMS receives the MIB information via the walk operation" and "transmitting at least part of the updated MIB information to the agent." Applicant submits that Muthiyan does not disclose or suggest at least these features of claim 3.

Muthiyan relates to "a system and method for generating SAN management objects corresponding to heterogeneous Storage Access Network (SAN) components from discovered SAN information" where the "heterogeneous SAN components may include proxy agents and their corresponding one or more proxied SAN components." Muthiyan, col. 2, lines 33-36 and lines 49-51.

In this context, Muthiyan discloses a

McDONNELL BOEHNEN
HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE, 32ND FLOOR
CHICAGO, IL 60606
(312)913-0001

> proxy agent may provide management information for each of its proxied SAN components that may be used by the SAN management server for monitoring the proxied SAN components over a network separate from the SAN fabric (e.g. out-of-band monitoring). In one embodiment, the management information provided by the proxy agent may include a Simple Network Management Protocol (SNMP) Management Information Base (MIB) table for the proxy agent. In one embodiment, the management information provided by the proxy agent may include a SNMP MIB table for each proxied SAN component.
>
> Muthiyan, col. 3, lines 20-30.

Muthiyan also discloses that "the SAN management server 200 may receive SNMP traps from elements on the SAN. To monitor conditions on a SAN using SNMP traps, some SAN objects may send SNMP traps to the SAN management server 200 when an event happens." Muthiyan, col. 17, lines 4-6. *See also* Muthiyan, col. 17, lines 21-22.

Muthiyan also states that "FIG. 21 is a flowchart illustrating a method of discovering proxied objects from the proxy device using configurable rules according to one embodiment." Muthiyan, col. 58, lines 10-12. Figure 21 of Muthiyan is disclosed below for the Examiner's convenience.

Figure 21

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HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE, 32ND FLOOR
CHICAGO, IL 60606
(312)913-0001

In describing Figure 21, Muthiyan discloses that

> [a]fter SAN discovery by the SAN access layer, for each proxy device, the proxy device MIB may be processed to match information from the proxy device MIB with information discovered by the SAN access layer. The proxy device MIB may be versioned. In on embodiment, the method may first find the version of the proxy device MIB. The MIB may include a revision object. In one embodiment, this object may be polled to return version information. The configurable rules file may be accessed to determine the exact MIB attribute to poll to get the version information.

Muthiyan, col. 58, lines 33-42.

In describing Figure 21, Muthiyan also discloses that "at 552, the proxy MIB name table may be accessed to get the MIB instance identifiers of the proxied devices. For each proxy device, the name table may be walked to get the proxied device names." Muthiyan, col. 58, lines 47-50. Muthiyan continues to state that "at 554, the proxy MIB URL table may be accessed to get the IP addresses of the proxied devices. For each proxy device, the URL table may be walked to get the MIB instance identifiers of the proxied devices." Muthiyan, col. 58, lines 56-59. Muthiyan additionally states that "at 556, the proxy MIB WWN table may be accessed to get the MIB instance identifiers of the proxied devices' ports. For each proxy device, the WWN table may be walked to get the WWNs of the ports." Muthiyan, col. 58, line 66 – col. 59, line 2. *See also* Muthiyan, col. 59, lines 15-20 (describing walking a "proxied device MIB").

While Muthiyan does disclose walking a proxy MIB name table, a proxy MIB URL table, a proxy MIB WWN table, and a proxied device MIB, as quoted in the preceding paragraph, Muthiyan does not disclose or suggest "transmitting to the agent a request to perform a walk operation" as recited in claim 1. Instead, Muthiyan is silent regarding requests to perform these walk operations.

Further, while Muthiyan discloses the use of traps (*e.g.,* Muthiyan, col. 17, lines 4-6 and quoted above), Muthiyan does not disclose or suggest "transmitting to the agent a request to

McDONNELL BOEHNEN
HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE, 32ND FLOOR
CHICAGO, IL 60606
(312)913-0001

perform a walk operation" that is "in response to receiving the trap message" as recited in claim 1.

Additionally, Muthiyan does not disclose or suggest that "updated MIB information" is "transmit[ted] to the agent" as recited in claim 1. In discussing Figure 21, Muthiyan is silent regarding MIB information flow to the proxy devices from the SAN access layer; rather, Muthiyan only discloses MIB information flow to the SAN access layer from MIBs processed on the proxy devices. *See* Muthiyan, col. 58, lines 47-50; col. 58, lines 56-59; and col. 58, line 66 – col. 59, line 2 (quoted above).

For at least these reasons, Applicant submits that Muthiyan does not disclose or suggest all of the features of claim 3.

ii. Discussion of Andrews

Andrews does not cure the above-mentioned deficiencies in Muthiyan and does not disclose or suggest all features of claim 3.

Andrews is related to "a node management scheme that advantageously supports multiple SNMP agents in a single platform (e.g., a network element or node)." Andrews, col. 2, lines 30-32. Andrews also discloses "a method of effectuating management communication in a network management system for managing a node. The management system includes an SNMP master agent and at least one SNMP peer agent...." Andrews, col. 2, lines 61-64.

However, Andrews does not disclose or suggest "in response to receiving the trap message, transmitting to the agent a request to perform a walk operation, wherein the NMS receives the MIB information via the walk operation" or "transmitting at least part of the updated MIB information to the agent" as recited in claim 3. Thus, Andrews does not cure the above-mentioned deficiencies in Muthiyan.

As the cited art of Muthiyan and Andrews, alone or in combination, do not disclose or suggest all features of claim 3, Applicant submits the cited art does not support rejection of claim 3 under 35 U.S.C. § 103. Additionally, the Examiner has failed to make a *prima facie* case for rejecting claim 3. For at least these reasons, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 3 under 35 U.S.C. § 103.

iii. Response to the Rejections of the Remaining Claims

Independent claim 8 recites, in part, "in response to determining that the change has occurred to the MIB information associated with the agent, transmitting a trap message to a network management system (NMS)", "receiving a request to perform a walk operation from the NMS, wherein the walk operation provides the MIB information to the NMS", and "receiving at least part of the MIB information from the NMS, wherein the at least part of the MIB information was updated by the NMS."

As discussed above, Muthiyan and Andrews, alone or in combination, do not disclose or suggest at least these features of claim 8. Therefore, Applicant submits the cited art does not support rejection of claim 8 under 35 U.S.C. § 103. Additionally, the Examiner has failed to make a *prima facie* case for rejecting claim 8. For at least these reasons, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 8 under 35 U.S.C. § 103.

Claim 14 recites, in part, "a network management system (NMS) comprising a computing device" where "the NMS is configured to receive a trap message from an agent that has access to an agent MIB, in response to receiving the trap message, conduct a walk operation on the agent MIB, and based on a result of the walk operation, update the NMS MIB, wherein the NMS is further configured to transmit at least part of the updated NMS MIB to the agent."

McDONNELL BOEHNEN
HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE, 32ND FLOOR
CHICAGO, IL 60606
(312)913-0001

As discussed above, Muthiyan and Andrews, alone or in combination, do not disclose or suggest at least these features of claim 14. Therefore, Applicant submits the cited art does not support rejection of claim 14 under 35 U.S.C. § 103. Additionally, the Examiner has failed to make a *prima facie* case for rejecting claim 14. For at least these reasons, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 14 under 35 U.S.C. § 103.

Also, the remarks made above with respect to claims 3, 8, and 14 apply equally to dependent claims 4-6, 9-10, 13, 15-17, and 19-22, which depend directly or indirectly from claims 3, 8, and 14. On at least this basis, the Applicant requests reconsideration and withdrawal of the rejections of dependent claims 4-6, 9-10, 13, 15-17, and 19-22 under 35 U.S.C. § 103(a). Additionally, the Examiner has failed to make a *prima facie* case for rejecting claims 4-6, 9-10, 13, 15-17, and 19-22. For at least these reasons, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 4-6, 9-10, 13, 15-17, and 19-22 under 35 U.S.C. § 103.

IV. Conclusion

Applicant submits that all outstanding claim rejections have been addressed herein and respectfully requests the Examiner to withdraw all outstanding claim rejections. The Examiner is invited to call the undersigned to expedite prosecution of the application at 312-913-3338.

Respectfully submitted,

McDonnell Boehnen
Hulbert & Berghoff LLP

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By: /Thomas J. Loos/
Thomas J. Loos
Reg. No. 60,161

McDONNELL BOEHNEN
HULBERT & BERGHOFF LLP
300 SOUTH WACKER DRIVE, 32ND FLOOR
CHICAGO, IL 60606
(312)913-0001